

Exhibit A

**Sworn Declaration of Alexa M.
Hayden**

1 CHRISTOPHER M. PETERSON
Nevada Bar No.: 13932
2 JACOB VALENTINE
Nevada Bar No.: 16324
3 **AMERICAN CIVIL LIBERTIES**
4 **UNION OF NEVADA**
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9 *Attorneys for Defendant Students for Justice in Palestine UNLV*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 COREY GERWASKI;

13 Plaintiff,

14 vs.

Case No.: 2:24-cv-00985-APG-MDC

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16 STATE OF NEVADA, ex rel. BOARD OF
REGENTS of the NEVADA SYSTEM OF
17 HIGHER EDUCATION, on behalf of the
18 UNIVERSITY OF NEVADA, LAS VEGAS;
KEITH WHITFIELD, individually; AJP
19 EDUCATIONAL FOUNDATION INC., a
20 California Non-Profit Corporation; STUDENTS
FOR JUSTICE OF PALESTINE-UNLV;
21 NATIONAL STUDENTS FOR JUSTICE OF
22 PALESTINE; NEVADANS FOR
PALESTINIAN LIBERATION; DOES I-XX
23 and ROE entities I-XX,

24 Defendants.

25 **DECLARATION OF ALEXA M. HAYDEN**

26 I, ALEXA M. HAYDEN, under penalty of perjury under the laws of the United States and
27 in accordance with 28 U.S.C. § 1746, declare the following:
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- 1 1. I am over eighteen and of sound mind.
- 2 2. I have personal knowledge of the facts set forth in this declaration.
- 3 3. I make this declaration in support of the above-reference action.
- 4 4. I am the current acting president of Students for Justice in Palestine, University of Nevada,
5 Las Vegas ("SJP UNLV").
- 6 5. SJP UNLV is a student organization registered with the University of Nevada, Las Vegas
7 ("UNLV").
- 8 6. UNLV is a public university and Nevada governmental entity.
- 9 7. SJP UNLV is a diverse group of activists and organizers dedicated to advancing the cause
10 for Palestinian justice and liberation by organizing community activities, educational
11 events, and advocacy actions to build awareness, solidarity, and a network of community
12 organizers.
- 13 8. SJP UNLV is currently in good standing with UNLV.
- 14 9. The organization's constitution, faculty advisor, and student roster are available on
15 UNLV's website.
- 16 10. SJP UNLV is a separate organization from National Students for Justice in Palestine
17 (NSJP).
- 18 11. While SJP UNLV takes into consideration information provided by National Students for
19 Justice in Palestine (NSJP) in scheduling protests and issuing messaging related to the war
20 in Gaza, SJP UNLV is not required to follow instructions issued by NSJP.
- 21 12. NSJP has not directed SJP UNLV to post any particular message on social media, hold any
22 particular protest, meet with UNLV officials, or take any other action.
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1 13. After Hamas's October 7, 2023, attack on Israel and Israel's subsequent invasion into Gaza,

2 SJP UNLV has focused on protesting against the collateral damage caused by Israeli's
3 retaliatory military operations that have harmed non-combatants.
4

5 14. SJP UNLV has never advocated for Hamas, only the Palestinian people.

6 15. SJP UNLV has never had contact with Hamas.

7 16. SJP UNLV has never attempted to contact Hamas.

8 17. SJP UNLV is aware of the "Toolkit" referenced in Plaintiff's Amended Complaint that
9 Plaintiff accredits to NSJP.

10 18. SJP UNLV had no involvement in drafting the Toolkit and did not provide any input for
11 its creation.
12

13 19. To SJP UNLV's knowledge, NSJP times its nationwide protests to follow large military
14 offenses carried out by Israel.

15 20. To SJP UNLV's knowledge, NSJP's protests are not coordinated with Hamas.

16 21. SJP UNLV does not coordinate with Hamas in determining when to hold its protests.

17 22. All protests carried out by SJP UNLV on the UNLV campus have been held in areas
18 accessible to the general public.
19

20 23. SJP UNLV has organized protests on public sidewalks, public parks, and in the UNLV
21 amphitheater, which is a publicly accessible space.
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23 24. Every protest held UNLV campus was held in spaces previously approved by UNLV
24 administration.

25 25. All protests held off campus by SJP UNLV were held in areas accessible to the public,
26 including public streets, sidewalks, and parks.
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1 26. All of SJP UNLV's protests have been about the war in Gaza and have communicated SJP
2 UNLV's opinions on how the American public and governmental entities should respond
3 to that war.

4
5 27. SJP UNLV has only made statements at these protests that it knew to be true or made
6 without knowledge of falsity.

7 28. SJP UNLV's social media accounts represent the official views of the organization.

8 29. All of SJP UNLV's social media accounts are public.

9 30. All posts made by SJP UNLV on these accounts are visible to the public.

10 31. All of SJP UNLV's social media have been about the Israel-Palestine conflict.

11 32. Most posts made by SJP UNLV communicated SJP UNLV's opinions on how the
12 American public and governmental entities should respond to that conflict.

13 33. Some posts have publicized SJP UNLV's protests, efforts to petition UNLV, and the
14 organization's other advocacy efforts related to the war in Gaza.

15 34. All of SJP UNLV's social media posts are truthful or made without knowledge of falsity.

16 35. SJP UNLV met with then UNLV President Keith Whitfield in May of 2024 to discuss
17 whether UNLV would financially divest from companies connected to the war in Gaza and
18 issue a statement in support of Palestinian and Arab students attending UNLV.

19 36. Matthew Mondschein represented SJP UNLV during that meeting.

20 37. SJP UNLV has never engaged in violence or vandalism.

21 38. SJP UNLV has never set up an encampment on the UNLV campus or occupied any UNLV
22 buildings in violation of UNLV regulations.

23 39. SJP UNLV has always complied with the UNLV's regulations, including UNLV's time,
24 place, and manner restrictions related to expressive activity.

1 40. SJP UNLV has followed all local, state, and federal laws in carrying out its activities.

2 *I declare under penalty of perjury under the laws of the United States of America that the*
3 *foregoing is true and correct. See 28 U.S. Code § 1746.*
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6 Executed on: April 4th, 2025

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10 Alexa M. Hayden
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